



National Institutes of Health
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October 30, 2009

Dr. Christine Augustyniak
U.S. National Coordinator for the
OECD Test Guidelines Program
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 7509P
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Dr. Augustyniak:

We have recently been made aware of a notification from OECD requesting public comments on the proposed OECD *Guidance Document for the Derivation of an Acute Reference Concentration (ARFC)*, with a requested deadline of October 15, 2009. The Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) Acute Toxicity Working Group (ATWG) is pleased to provide comments on this document. We are responding on behalf of the ICCVAM and the ATWG to express their support for the Guidance Document. We apologize for the delay in responding with our comments.

We ask that you forward these comments to the OECD Secretariat for consideration by the member countries as part of the U.S. position on this document. If for some reason you propose to not agree with any of the comments as part of the U.S. position, we ask that we have the opportunity to discuss the U.S. position with you before it is finalized. We also ask that you share with us any other U.S. comments that were provided so that we can make them available to ICCVAM and the ATWG.

We believe that expeditious adoption of this proposed Guidance Document would support the development of an acute inhalation reference concentration methodology, which will incorporate new developments in toxicology and risk assessment. Please feel free to contact us at any time if you have questions about the comments.

Sincerely,

/s/ _____

William S. Stokes, D.V.M., D.A.C.L.A.M.
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Enclosure